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*Co-Counsel to the Ad Hoc Committee of
Governmental and Other Contingent
Litigation Claimants*

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

----- x
In re : Chapter 11
:
PURDUE PHARMA L.P., *et al.*, : Case No. 19-23649 (RDD)
:
Debtors¹. : (Jointly Administered)
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**TWENTY FIFTH MONTHLY FEE STATEMENT OF OTTERBOURG P.C. FOR
ALLOWANCE OF COMPENSATION FOR SERVICES RENDERED AND
REIMBURSEMENT OF EXPENSES INCURRED AS CO-COUNSEL OF THE AD HOC
COMMITTEE'S PROFESSIONALS FOR THE PERIOD OF
OCTOBER 1, 2021 THROUGH AND INCLUDING OCTOBER 31, 2021**

Name of Applicant:	Otterbourg P.C.
Applicant's Role in Case:	Co-Counsel to the Ad Hoc Committee of Governmental and Other Contingent Litigation Claimants
Date of Order Approving Debtors' Payment of Fees and Expenses of Applicant:	December 2, 2019, [dkt. no. 553]

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF L.P. (0495), SVC Pharma L.P. (5717) and SVC Pharma Inc. (4014). The Debtors' corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

Period for Which Compensation is Sought:	October 1, 2021 – October 31, 2021
Total Amount of Fees Incurred:	\$65,100.50
Total Fees Requested (80%):	\$52,080.40
Total Reimbursement of Expenses Incurred:	\$0.00
Total Reimbursement of Expenses Requested (100%):	\$0.00
Total compensation and Reimbursement Requested in this Statement:	\$52,080.40
This is Applicant's:	Twenty Fifth Monthly Fee Statement

Pursuant to the *Order Authorizing the Debtors to Assume the Reimbursement Agreement and Pay the Fees and Expenses of the Ad Hoc Committee's Professionals*, dated December 2, 2019 [Dkt. No. 553] (the "Fee Assumption Order"), and the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals*, dated November 21, 2019 [Dkt. No. 529] (the "Interim Compensation Order"), Otterbourg P.C. (the "Applicant"), Co-Counsel to the Ad Hoc Committee of Governmental and Other Contingent Litigation Claimants in the above-captioned case, hereby submits this Twenty Fifth Monthly Fee Statement (the "Fee Statement") for the period of October 1, 2021 through and including October 31, 2021 (the "Statement Period").

Itemization of Services Rendered and Disbursements Incurred

1. Annexed hereto as **Exhibit A** is a chart of the aggregate number of hours expended and fees incurred by professionals and paraprofessionals during the Statement Period with respect to each of the project categories. As reflected in Exhibit A, Applicant incurred \$65,100.50 in fees during the Statement Period. Pursuant to this Fee Statement, Applicant seeks reimbursement for 80% of such fees, totaling \$52,080.40.

2. Annexed hereto as **Exhibit B** is a chart of Applicant's professionals and paraprofessionals, including the standard hourly rate for each attorney and paraprofessional who rendered services to the Debtors in connection with these chapter 11 cases during the Statement Period and the title, hourly rate, aggregate hours worked and the amount of fees earned by each professional². The blended hourly billing rate of attorneys for all services provided during the Statement Period is \$1,246.52³. The Blended hourly rate of all paraprofessionals is \$345.00⁴. A copy of the computer-generated time entries reflecting the time recorded, organized in project billing categories by Applicant is attached hereto as **Exhibit C**.

3. Applicant, to the best of its knowledge, has not included any fees in connection with or relating to the allocation of value among the Debtors' creditors.

Notice

4. Applicant will provide notice of this Fee Statement in accordance with the Interim Compensation Order.

WHEREFORE, Applicant, in connection with services rendered as co-counsel to the ad hoc committee of governmental and other contingent litigation claimants, respectfully requests (i) compensation in the amount of \$52,080.40, which is equal to 80% of the total amount of

² In accordance with the Interim Fee Order and Amended Guidelines for Fees and Disbursements for Professionals in the Southern District of New York Bankruptcy Cases (June 17, 2013), Otterbourg is providing notice that its hourly rates changed during this Monthly Fee Period, effective October 1, 2021. Otterbourg's hourly rates are set at a level designed to fairly compensate it for the work of its attorneys and paraprofessionals. Otterbourg's hourly rates are subject to periodic adjustment to reflect economic and other conditions and are consistent with the rates charged by other firms rendering comparable services. Otterbourg determined to adjust its rates in the manner set forth herein after its annual review of its hourly rates. In accordance with Section 330(a)(3)(F) of title 11 of the United States Code, as amended (the "Bankruptcy Code"), Otterbourg represents that the hourly rates, as set forth herein, (a) reflect economic and other conditions, (b) are consistent with rates charged elsewhere, and (c) are reasonable based on the customary compensation charged by practitioners of comparable skill in cases other than cases under the Bankruptcy Code.

³ The blended hourly billing rate of \$1,246.52 is derived by dividing the total fees for attorneys of \$64,445.00 by the total hours of 51.7.

⁴ The Blended hourly billing rate of \$345.00 for paraprofessionals is similarly derived by dividing the total fees for paraprofessionals of \$655.50 by the total hours of 1.9.

reasonable compensation for actual, necessary legal services that Applicant incurred in connection with such services during the Statement Period (*i.e.*, \$65,100.50).

Dated: December 8, 2021
New York, New York

OTTERBOURG P.C.

By: /s/ Melanie L. Cyganowski
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EXHIBIT A

Fees By Project Category

**SUMMARY OF COMPENSATION BY PROJECT CODE
FOR THE STATEMENT PERIOD**

Project Code	Project Category	Total Hours	Total Fees
PU08	Litigation: Contest Matters, Adversary	7.0	\$6,052.00
PU09	Meetings and Communications w/ AHC	4.1	\$5,497.00
PU11	Plan & Disclosure Statement	42.5	\$53,551.50
	TOTALS:	53.6	\$65,100.50

EXHIBIT B

Professional and Paraprofessional Fees

**SUMMARY OF HOURS BILLED BY PROFESSIONALS AND PARAPROFESSIONALS
FOR THE STATEMENT PERIOD**

Professional	Year Admitted	Rate Per Hour	No. of Hrs.	Total Compensation
Melanie L. Cyganowski ("MLC") Partner	1982	\$1470.00	29.9	\$43,953.00
Jennifer S. Feeney ("JSF") Of Counsel	1998	\$940.00	21.8	\$20,492.00
Jessica K. Hildebrandt ("JKH") Paralegal	N/A	\$345.00	1.9	\$655.50
	TOTAL		53.6	\$65,100.50

EXHIBIT C

Time Detail

OTTERBOURG P.C.
230 PARK AVENUE
NEW YORK, NY 10169-0075

Client/Matter No.: 20186/0002
Matter Name: CHAPTER 11
Billing Partner: RL STEHL

November 30, 2021
BILL NO. 220460

For Services Rendered Through October 31, 2021:

Phase: PU08		LITIGATION: CONTESTED MATTERS, ADVERSARY	
<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
10/11/21 MLC	Correspondence Correspondence with Gilbert firm re certain insurance discovery requests and responses	.80	1,176.00
10/12/21 JSF	Examine Documents Review of Draft Responses to Discovery Response re: Insurance Litigation and Underlying Related Documents	1.10	1,034.00
10/19/21 JSF	Examine Documents Review of Document Requests to AHC re: Insurance Litigation	.30	282.00
10/19/21 JSF	Telephone Call(s) Call with Co-Counsel re: Responses to Document Requests	.70	658.00
10/26/21 JSF	Examine Documents Review of Documents in Response to Discovery Requests in Insurance Litigation	2.50	2,350.00

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
10/26/21 JKH	Review/analyze Review of documents in connection with insurance litigation and discovery	1.60	552.00
TOTAL PHASE PU08		7.00	\$6,052.00

Phase: PU09	MEETINGS & COMMUNICATIONS W/ AD HOC
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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
10/05/21 MLC	Conference call(s) Weekly conference call with state representatives from AHC	.80	1,176.00
10/06/21 JSF	Telephone Call(s) Attend Weekly Meeting of AHC	.60	564.00
10/06/21 MLC	Conference call(s) Weekly conference call meeting with AHC	.80	1,176.00
10/13/21 JSF	Telephone Call(s) Attend Weekly Update Meeting of AHC	.40	376.00
10/13/21 MLC	Conference call(s) Weekly meeting of AHC committee	.50	735.00

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
10/26/21 MLC	Conference call(s) Conference call with AHC co-counsel and State Subgroup re post effective date plan issues	1.00	1,470.00
TOTAL PHASE PU09		4.10	\$5,497.00

Phase: PU11	PLAN & DISCLOSURE STATEMENT
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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
10/01/21 JSF	Telephone Call(s) Call with Professionals and States' Working Group re: Appellate Process	.70	658.00
10/01/21 MLC	Conference call(s) Conference call with AHC counsel and state representatives re various appellate issues and update	.70	1,029.00
10/01/21 MLC	Correspondence Correspondence with AHC counsel re appellate issues	.70	1,029.00
10/05/21 MLC	Analysis of Memorandum Review of KL memorandum concerning appellate issues	1.20	1,764.00

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November 30, 2021
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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
10/06/21 JSF	Examine Documents Review of Appeal Updates and Appeal Issues Memo	2.10	1,974.00
10/06/21 MLC	Analysis of Memorandum Review of memorandum prepared by KL re status of appellate motions and research analysis re same	1.80	2,646.00
10/06/21 MLC	Analysis of Memorandum Review of Maryland Statement of Issue on Appeal	.60	882.00
10/06/21 MLC	Analysis of Memorandum Review of Oregon Statement of Issue on Appeal	.50	735.00
10/07/21 JSF	Telephone Call(s) Call with Co-Counsel and States' Representatives re: Updates	.40	376.00
10/07/21 JSF	Examine Documents Review of Submissions re: Appeals of Confirmation Order	.90	846.00
10/08/21 JSF	Examine Documents Review of Updates and New Filings re: Appeals	.60	564.00

OTTERBOURG P.C.
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November 30, 2021
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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
10/08/21 MLC	Examine Documents Review of California's Statement of Issues to be Presented on Appeal	.80	1,176.00
10/08/21 MLC	Examine Documents Review of court order re restriction on writing letters	.50	735.00
10/08/21 JKH	Review/analyze Review SDNY docket in connection with hearing re: appeal to confirmation and prepare brief email	.30	103.50
10/11/21 JSF	Examine Documents Review of Updates re: Appeals and TRO	.60	564.00
10/11/21 MLC	Examine Documents Review of draft fee motions by MSGE and NCSG	1.20	1,764.00
10/11/21 MLC	Examine Documents Review of summary memo from KL concerning UST Brief in Support of Stay Pending Appeal and TRO by District Court	.90	1,323.00
10/11/21 MLC	Correspondence Correspondence from KL concerning various conversations re issue of mootness	.30	441.00
10/12/21 JSF	Telephone Call(s) Attend Hearing Before District Court re: Appellate Schedule and Stay Relief	2.10	1,974.00

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BILL NO. 220460

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
10/12/21 JSF	Examine Documents Review of Appellate Updates	.30	282.00
10/13/21 JSF	Telephone Call(s) Call with Purdue Professionals and State Reps re: Appeals Updates	.80	752.00
10/13/21 JSF	Examine Documents Appeals Updates - Review of Objections to Certification Motions	.70	658.00
10/13/21 JSF	Examine Documents Review of Judge McMahon Decision re: UST Stay Motion	.30	282.00
10/13/21 MLC	Examine Documents review and analysis of Judge McMahon's Order denying without prejudice the UST motion for a stay pending appeal	.90	1,323.00
10/13/21 MLC	Examine Documents Review of draft objection to motion to certify	1.00	1,470.00
10/14/21 JSF	Telephone Call(s) Attend Omnibus Hearing re: Appeals - Direct Certification and Pre-Trial Stay Conference	5.70	5,358.00

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
10/14/21 MLC	Examine Documents Reviewed summary of Judge Drain's ruling denying motions to certify the appeals for direct review by the Second Circuit	.90	1,323.00
10/15/21 MLC	Examine Documents Review of draft of mootness stipulation	1.40	2,058.00
10/18/21 JSF	Examine Documents Review of UST Clarification Motion and District Court Order re: Clarification of Stay Order	.40	376.00
10/18/21 MLC	Examine Documents Review of various exhibits to be attached to motion to seek reimbursement of certain professional fees by NCSG and MSGE	.80	1,176.00
10/18/21 MLC	Analysis of Memorandum Review and analysis of Judge McMahon's clarifying order	.70	1,029.00
10/18/21 MLC	Analysis of Memorandum Review of UST Motion for Clarification	1.30	1,911.00
10/19/21 MLC	Examine Documents Follow up re discovery requests in insurance adversary proceeding	1.10	1,617.00

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November 30, 2021
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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
10/20/21 MLC	Examine Documents Review of draft objection to various pending motions for a stay pending appeal	1.30	1,911.00
10/20/21 MLC	Examine Documents Review of motion by NCSG and MSGE to seek reimbursement of certain professional fees	.90	1,323.00
10/21/21 JSF	Examine Documents Review of Case Updates to AHC	.20	188.00
10/22/21 MLC	Examine Documents Review of Trainor declaration and UCC opposition to motions for stay pending appeal	2.10	3,087.00
10/22/21 MLC	Correspondence Correspondence re change in briefing schedule	.20	294.00
10/26/21 MLC	Correspondence Correspondence with AHC counsel re TopCo board members	.80	1,176.00
10/26/21 MLC	Correspondence Correspondence with AHC co counsel re MDT board and selection of board members	.70	1,029.00
10/28/21 JSF	Examine Documents Review of Summary of Appellate Briefs	.40	376.00

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November 30, 2021
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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
10/28/21 MLC	Conference call(s) Conference call with co-counsel to AHC and State subgroup re open issues	.60	882.00
10/28/21 MLC	Correspondence Correspondence with AHC counsel re various trustee nominations post-effective date	.80	1,176.00
10/28/21 MLC	Examine Documents Review of chart summarizing each of the appellant briefs	1.30	1,911.00
TOTAL PHASE PU11		42.50	\$53,551.50
		TOTAL FOR SERVICES	\$65,100.50
		TOTAL THIS STATEMENT	\$65,100.50